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18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK NATIONAL ASSOCIATION,
28 AS TRUSTEE FOR GSR MORTGAGE
29 LOAN TRUST 2006-4F, MORTGAGE
30 PASS-THROUGH CERTIFICATES,
31 SERIES 2006-4F,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,
35 INC., et al.,

36 Defendants.

Case No.: 2:21-cv-00455-GMN-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 10] AND MOTION FOR FEES
AND COSTS [ECF No. 11]**

(Second Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank
2 National Association (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of
3 record, hereby stipulate and agree as follows:

- 4 1. On March 18, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-21-831364-C [ECF No. 1-1];
- 6 2. On March 18, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.
7 1];
- 8 3. On April 19, 2021, U.S. Bank filed a Motion for Remand [ECF No. 10] and Motion
9 for Costs and Fees [ECF No. 11];
- 10 4. On May 3, 2021, the Court granted the parties’ first request to extend Chicago Title’s
11 time to respond to the Motion for Remand and Motion for Costs and Fees.
- 12 5. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion
13 for Costs and Fees is now June 4, 2021;
- 14 6. Chicago Title’s counsel is requesting an additional extension until June 30, 2021, to
15 file its response to the pending Motion for Remand and Motion for Costs and Fees;
- 16 7. Chicago Title requests a further extension of time to respond to the Motion for
17 Remand and Motion for Costs and Fees to afford Chicago Title additional time to
18 respond to the legal arguments set forth in U.S. Bank’s motions;
- 19 8. U.S. Bank does not oppose the requested extension;
- 20 9. This is the second request for an extension which is made in good faith and not for
21 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 10] and Motion for Costs and Fees [ECF No. 11] is hereby extended
3 through and including June 30, 2021.

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5 Dated: June 2, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: June 2, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

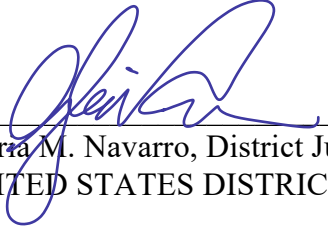
14 Dated: June 2, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Christina V. Miller
16 DARREN T. BRENNER
17 CHRISTINA V. MILLER
18 Attorneys for Plaintiff U.S. BANK
19 NATIONAL ASSOCIATION

20 **IT IS SO ORDERED.**

21 Dated this 3 day of June, 2021.

22
23 
24 _____
25 Gloria M. Navarro, District Judge
26 UNITED STATES DISTRICT COURT
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1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that on June 2, 2021, I electronically filed the foregoing with the Clerk of

4 the Court using the CM/ECF system which will send notification of such filing to the Electronic

5 Service List for this Case.

6 I declare under penalty of perjury under the laws of the United State of America that the

7 foregoing is true and correct.

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10 /s/ D'Metria Bolden

11 D'METRIA BOLDEN

12 An Employee of EARLY SULLIVAN

13 WRIGHT GIZER & McRAE LLP

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